

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY SCHEPIS,  
FRANK CANELAS, JR., *and*  
PURSUIT OPPORTUNITY FUND I, L.P.,

Plaintiffs/Counterclaim-Defendants,

v.

JPMORGAN CHASE BANK, N.A.,  
PETER S. CANE, *and*  
CANELAW LLP,

No. 20 CV 2647 (LJL)

Defendants/Counterclaim-Plaintiffs/  
Third-Party Plaintiffs,

v.

CLARIDGE ASSOCIATES, LLC,  
JAMISCOTT LLC,  
LESLIE SCHNEIDER, *and*  
LILLIAN SCHNEIDER,

Third-Party Defendants.

**JOINT STIPULATION OF SETTLEMENT**

WHEREAS all parties to this action have executed a Joint Stipulation of Dismissal with prejudice of all claims and counterclaims and third-party claims in this action,

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for all parties hereto, as follows:

1. Each party has opposed and contested the validity of the claims, counterclaims and third-party claims asserted against it in this action; and no party admits liability or wrongdoing of any kind;

2. All parties agree promptly to comply and to be bound by any order of the Superior Court of the State of Connecticut in the action captioned *Claridge Assocs., LLC et al. v. Pursuit Partners, LLC et al.*, No. FS3-FST-15-CV-6026069-S as may direct the disposition of assets held in the Peter S. Cane Attorney Trust Account held at JPMorgan Chase Bank and identified by Account No. -8990.

3. In addition to the agreement set forth in paragraph 2 above, the parties further agree that notwithstanding any order of the Superior Court of the State of Connecticut directing the disposition of assets held in the Peter S. Cane Attorney Trust Account held at JPMorgan Chase Bank and identified by Account No. -8990, such assets shall not be disbursed from that account unless and until any parties to this agreement who may contest such order of the Superior Court have exhausted all appeals to a higher court in the State of Connecticut that the contesting party or parties may take from the Superior Court order, and such appeals are complete and no further appeal may be taken.

4. This stipulation may be executed electronically and in counterparts, each of which is deemed an original.



Sabato P. Fiano  
Zeldes Needle & Cooper, P.C.  
263 Tresser Boulevard, 14<sup>th</sup> Floor  
Stamford, CT 06901  
(203) 332-5791  
sfiano@znclaw.com

*Attorneys for Anthony Schepis,  
Frank Canelas, Jr., and Pursuit Opportunity  
Fund, I, L.P.*

Dated: 12/9/2020



Wesley M. Mullen (WM1212)  
Mullen P.C.  
200 Park Avenue | Suite 1700  
New York, NY 10166  
(646) 632-3718  
wmullen@mullenpc.com

*Attorneys for Peter S. Cane and  
CaneLaw LLP*

Dated: December 8, 2020



---

Paul E. Knag  
Murtha Cullina LLP  
185 Asylum Street  
Hartford, CT 06103  
(203) 772-7711  
pknag@murthalaw.com

*Attorneys for Claridge Associates, LLC,  
Jamiscott, LLC, Leslie Schneider, and  
Lillian Schneider*

Dated: 12/10/20